

EXHIBIT A

SCIOTO COUNTY
IN THE COURT OF COMMON PLEAS OHIO
SCIOTO COUNTY, OHIO FILED

RONNIE COX
136 PVT RD 17339
PEDRO, OH 45659

PLAINTIFF

VS

G & J PEPSI-COLA BOTTLERS, INC
9435 WATERSTONE BLVD, SUITE 390
CINCINNATI, OH 45249

DEFENDANT

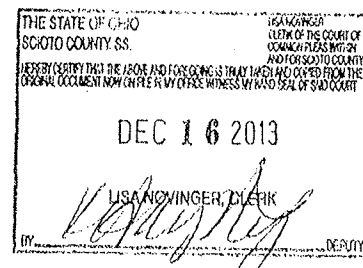
and

PEPSI-COLA BOTTLING COMPANY OF PORTSMOUTH
4587 GALLIA PIKE
FRANKLIN FURNACE, OH 45629

DEFENDANT

2013 DEC 16 PM 2:58
Lisa A. Winger
JUDGE CLERK OF COURTS
CASE NO. 13 CIH 217

COMPLAINT FOR DAMAGES



The Plaintiff, Ronnie Cox, now comes before this Court and alleges the following:

1. At all times material herein, I am and have been an employee of the Defendant, G & J Pepsi-Cola Bottlers, Inc., and Pepsi-Cola Bottling Company of Portsmouth and am so employed in at the Defendants' facility located in Franklin Furnace, Scioto County, Ohio.
2. Defendant G & J Pepsi-Cola Bottlers, Inc. is the parent company of the Defendant Pepsi-Cola Bottling Company of Portsmouth.

COUNT ONE

3. At the end of May 2013 the Plaintiff was working for the Defendant, G&J Pepsi Bottlers, Inc. through the Defendant Pepsi-Cola Bottling Company of Portsmouth.

4. The Plaintiff is a member of the local union and represent the other members of the union in the Defendants' facility located in Franklin Furnace, Scioto County, Ohio.
5. The supervisor for employer at the Defendant, Rick Justice, has attempted to cause the Plaintiff to engage in inappropriate behavior and has been conducting surveillance activities in order to cause the Plaintiff harm.
6. The Defendants' agent, Rick Justice is retaliating against the Plaintiff on the Defendants' behalf as a result of the union activities engaged in by the Plaintiff.
7. As a result of the willful and wanton actions of the Defendants through the agent of the Defendants, the Plaintiff has and continues to be subjected to a hostile work environment.
8. As a result of the willful and wanton actions which have created the hostile work environment, the Plaintiff is suffering harm in an amount in excess of \$25,000.00.

COUNT TWO

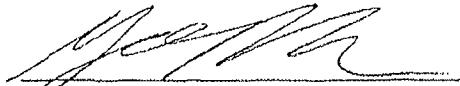
9. The Plaintiff hereby incorporates paragraphs 1 through 8 as if fully rewritten herein.
10. The Defendants, through the agents of the Defendants, are retaliating against the Plaintiff due to the union activities of the Plaintiff.
11. The retaliatory actions of the Defendants is a willful and wanton action conducted on behalf of the Defendants by its agent.
12. As a result of the willful and wanton retaliation, the Plaintiff has and continues to suffer harm in an amount in excess of \$25,000.00.

COUNT THREE

13. The Plaintiff hereby incorporates paragraphs 1 through 12 as if fully rewritten herein.
14. The Defendants, through the Defendants' agent are retaliating against the Plaintiff for pursuing union activity in violation of State and Federal Statues.

15. As a result of the retaliation of the Defendants, through the agent of the Defendants, the Plaintiff has and continues to suffer harm in an amount in excess of \$25,000.00.

Wherefore, the Plaintiff demands compensatory damages from the Defendants jointly and severally in an amount in excess of \$25,000.00; punitive damages for the willful and wanton actions of the Defendants, jointly and severally in the amount of \$1,000,000.00; attorney fees; the cost or prosecution of this action; court cost; any other relief which is just and equitable.

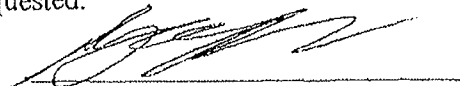


Gene Meadows, 0041890
Attorney for Plaintiff
538 Sixth Street
Portsmouth, OH 45662
(740)353-1509
Fax (740)355-3505
meadows.gene@gmail.com

Instructions for Service

To the Clerk:

Please prepare a copy of the complaint filed herein to be served upon the Defendant, G & J Pepsi-Cola Bottlers, Inc., 9435 Waterstone Blvd., Suite 309, Cincinnati, OH 45249 and upon the Defendant Pepsi-Cola Bottling Company of Portsmouth, 4587 Galia Pike, Franklin Furnace, OH 45629 by certified US Mail, return receipt requested.



Gene Meadows, 0041890
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS
SCIOTO COUNTY, OHIO

RONNIE COX

PLAINTIFF

JUDGE

vs

CASE NO.

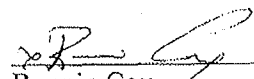
G & J PEPSI-COLA BOTTLERS, INC

AFFIDAVIT

DEFENDANT

I, Ronnie Cox, being duly sworn do depose and state:

1. I am an employee of G&J Pepsi Bottlers, Inc., hereinafter employer, and am so employed in Franklin Furnace, Scioto County, Ohio.
2. At the end of May 2013 I was working for my employer, G&J Pepsi Bottlers, Inc.
3. I am a member of the local union and represent the other members of the union in the employer's facility located in Franklin Furnace, Scioto County, Ohio.
4. I have been subjected to a hostile work environment as a result of my union activities.
5. The supervisor for employer at the local facility, Rick Justice, has attempted to cause me to engage in inappropriate behavior and has been conducting surveillance activities in order to cause me harm.
6. Employer's agent, Rick Justice is attempting to retaliate against me as a result of my union activities.
7. As a result of the hostile work environment and retaliation, I am suffering harm.



Ronnie Cox

Sworn to and subscribed before me, a notary public by Ronnie Cox on the 3 day of
December, 2013.


Notary Public

My Commission expires never

GENEMEADOWS
ATTORNEY AT LAW
MY COMMISSION NEVER
EXPIRES
ORC 147.03

THE COURT OF COMMON PLEAS, SCIOTO COUNTY, OHIO
GENERAL DIVISION

SUMMONS ON COMPLAINT

RONNIE COX
136 PVT RD 17339
PEDRO, OH 45659

13CIH00217

vs.

PEPSI-COLA BOTTLING COMPANY OF PORTSMOUTH
4587 GALLIA PIKE
FRANKLIN FURNACE OH 45629

TO THE WITHIN NAMED DEFENDANT, PEPSI-COLA BOTTLING COMPANY OF
PORTSMOUTH

YOU ARE HEREBY SUMMONED THAT A COMPLAINT (A COPY OF WHICH IS ATTACHED
AND MADE A PART HEREOF) HAS BEEN FILED AGAINST YOU IN THIS COURT BY THE
PARTY NAMED HEREIN.

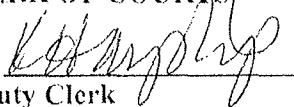
YOU ARE REQUIRED TO SERVE UPON THE PLAINTIFF'S ATTORNEY A COPY OF YOUR
ANSWER TO THE COMPLAINT WITHIN 28 DAYS AFTER SERVICE OF THIS SUMMONS UPON
YOU, EXCLUSIVE OF THE DAY OF SERVICE ON PLAINTIFF'S ATTORNEY. SAID ANSWER
MUST BE FILED WITH THIS COURT WITHIN 3 DAYS AFTER SERVICE ON PLAINTIFF'S
ATTORNEY.

THE NAME AND ADDRESS OF THE PLAINTIFF'S ATTORNEY IS AS FOLLOWS:

GENE MEADOWS
538 SIXTH STREET
PORTSMOUTH, OH, 45662

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST
YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

LISA D. NOVINGER
CLERK OF COURTS

BY: 
Deputy Clerk

12/16/2013

(RULE 4 1970 OHIO RULES OF CIVIL PROCEDURE)